

MARKS, O'NEILL, O'BRIEN, DOHERTY& KELLY, P.C.

BY: Christian M. Scheuerman, Esquire
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ATTORNEY FOR DEFENDANT
Healthcare Revenue Recovery Group,
LLC

190-100509 (SXK/CMS)

**Alejandro Morales, on behalf of himself
and those similarly situated,**

vs.

**Healthcare Revenue Recovery Group,
LLC**

**UNITED STATES DISTRICT COURT
OF NEW JERSEY
NEWARK VICINAGE**

DOCKET NO. 2:15-cv-08401-ES-JAD

CIVIL ACTION

**DECLARATION OF COUNSEL
IN SUPPORT OF DISCOVERY
CONFIDENTIALITY ORDER**

I, Christian M. Scheuerman, Esquire, of full age, do hereby declare as follows:

1. I am an attorney-at-law, licensed to practice in the District Courts of New Jersey and the Eastern District of Pennsylvania, and am an associate at the law firm of Marks, O'Neill, O'Brien, Doherty & Kelly, P.C., attorneys for the Defendant. I am fully familiar with the facts and circumstances of the above-captioned matter.
2. I submit this declaration in support of the entry of the proposed discovery confidentiality order. (Docket entry no. 25).
3. All counsel consent to the form of order.

4. The nature of materials sought to be kept confidential by the Defendant include documents which disclose confidential proprietary business information, trade secrets, and other commercially sensitive information.

5. The Defendant has a right not to have its confidential proprietary business information made public.

6. Unrestricted disclosure of the requested materials could result in dissemination of these sensitive and valuable materials to others who would utilize the information contained therein for commercial, business, competitive, or other purposes, causing HRRG to suffer irreparable injury and economic damage.

7. There are no less restrictive means available than the relief sought by the Defendants.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

BY: /s/ Christian M. Scheuerman

Christian M. Scheuerman, Esquire
Attorney for Defendant